### **Baker & Hostetler LLP**

45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Christa C. Turner

Attorney for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MARK B. EVENSTAD REVOCABLE TRUST u/a dated January 30, 2003; MARK B. EVENSTAD in his capacity as Grantor and Trustee for the Mark B. Evenstad Revocable Trust; SHANNON MAHONEY EVENSTAD in her capacity as Trustee for the Mark B. Evenstad Revocable Trust;

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04512 (SMB)

MARK B. EVENSTAD individually; and SHANNON MAHONEY EVENSTAD individually,

Defendants.

## FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures were exchanged on May 16, 2014
- 2. Fact Discovery shall be completed by: May 29, 2015
- 3. The Disclosure of Case-in-Chief Experts shall be due: August 14, 2015
- 4. The Disclosure of Rebuttal Experts shall be due: September 14, 2015
- 5. The Deadline for Completion of Expert Discovery shall be: October 13, 2015
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 14, 2015
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 28, 2015.
- 8. The Deadline for Conclusion of Mediation shall be: On or before April 26, 2016.

Dated: May 8, 2015

### **BAKER & HOSTETLER LLP**

By: /s Nicholas J. Cremona\_

45 Rockefeller Plaza

New York, New York 10111

Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas Cremona

Email: ncremona@bakerlaw.com

Christa C. Turner

Email: cturner@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC

## LOEB & LOEB, LLP

By: /s/ \_Daniel B. Besikof\_

345 Park Avenue

New York, New York 10154 Telephone: 212.407.4129 Facsimile: 646.417.6335

P. Gregory Schwed

Email: gschwed@loeb.com

Daniel B. Besikof

Email: dbesikof@loeb.com

Attorneys for Defendants